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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-cr-200-KJD-PAL
)	
Plaintiff,)	
)	
v.)	
)	
RAY ANDERSON,)	
)	
Defendant.)	
_____)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Rachel M. Korenblat, Assistant Federal Public Defender, counsel for Defendant RAY ANDERSON, that the date for the Government to file a response to the Defendant's Motion to Suppress (Docket #25) be extended for two (2) weeks.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on January 13, 2016. PACER set the Government's response deadline for January 30, 2016. *See* Docket #25.
2. The parties have commenced an attempt at negotiating the case, which would obviate the need for the Government to file a response to the Defendant's Motion.

1 3. The Defendant is incarcerated, but he does not object to the continuance of the
2 Government's response deadline.

3 4. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow the parties to attempt to negotiate this case, and then for the Government to have
5 adequate time to prepare an appropriate response to the Defendant's Motion if a negotiation is
6 unsuccessful.

7 5. Additionally, denial of this request for continuance could result in a miscarriage
8 of justice.

9 6. This is the first stipulation filed herein to continue the Government's response
10 deadline.

11 DATED: January 29, 2016.

12
13 _____
14 /s/
15 PHILLIP N. SMITH, JR.
16 Assistant United States Attorney
17 Counsel for the United States

18 _____
19 /s/
20 RACHEL KORENBLAT
21 Assistant Federal Public Defender
22 Counsel for Defendant RAY ANDERSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

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Plaintiff,)	
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RAY ANDERSON,)	
)	
Defendant.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion was filed and served on January 13, 2016. PACER set the Government's response deadline for January 30, 2016. *See* Docket #25.

2. The parties have commenced an attempt at negotiating the case, which would obviate the need for the Government to file a response to the Defendant's Motion.

3. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow the parties to attempt to negotiate this case, and then for the Government to have adequate time to prepare an appropriate response to the Defendant's Motion if a negotiation is unsuccessful.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

